

Anti-slavery and Human Trafficking Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Badenoch & Clark Limited (“we” or “our”) to prevent modern slavery and human trafficking in its business and supply chains during the year ending 31 December 2017.

Our Business

We have a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains. We published our first statement last year and since then we have continued to increase our work in this area.

We supply recruitment services and are part of the Adecco group of companies (“The Adecco Group”).

We are also members of the following trade bodies:

- Recruitment and Employment Confederation; and
- Association of Professional Staffing Companies.

We work closely with these trade bodies to improve industry-wide standards and advocate improved laws and policies where appropriate.

Commitment to Human and Labour Rights

The Adecco Group is a member of the World Employment Confederation and has a long history of promoting human rights. For example, in November 2003, The Adecco Group became the first organisation in our industry to sign the United Nations Global Compact. Further, in November 2008, UNI Global Union and the World Employment Confederation’s members, including The Adecco Group, signed a memorandum of understanding to consolidate the industry’s global social dialogue to achieve fair conditions for the temporary agency work industry. These two public endorsements are due to the fact that The Adecco Group acknowledges and recognises the:

- International Labour Organisation (“ILO”) Declaration on Fundamental Principles and Rights at work;
- ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; and
- OECD Guidelines for Multinational Companies.

In June 2013, the European Union commissioned sector-specific guidance for the employment and recruitment agencies sector on implementing the UN Guiding Principles on Business and Human Rights. The development of this guidance involved extensive research and multi-stakeholder consultation. The World Employment Confederation was involved in the drafting process from the beginning. The Adecco Group actively supported the World Employment Confederation and contributed to the various drafting and consultation phases.

The Adecco Group has published Human and Labour Rights Guidelines which sets out the Adecco Group’s commitment to International Labour Standards including the

relevant ILO Conventions (i.e. 29, 105 (Forced Labour) and 181). These provide guidance and raise awareness amongst The Adecco Group's stakeholders.

In June 2017, The Adecco Group also published a white paper, "The labour market integration of refugees – A focus on Europe" which showcases best practices of labour market inclusion by companies, including recommendations for both policy makers and employers to address inclusion.

Further, The Adecco Group's Corporate Social Responsibility strategy has been defined in alignment with The Adecco Group's overall strategy which includes human and labour rights.

The steps taken by The Adecco Group so far are part of The Adecco Group's mission to meet our human and labour rights standards, with a specific focus on forced labour and human trafficking.

Policies

Our Anti-slavery and Human Trafficking Policy ("the Anti-slavery Policy") reflects our commitment to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and supply chains. The Anti-slavery Policy sets out our zero-tolerance approach to modern slavery and human trafficking. Every member of staff is expected to comply with the policy, which includes raising any concerns and using the appropriate reporting channels at the earliest possible stage.

We also operate a Whistleblowing Policy that encourages all staff to report any wrongdoing (including any breaches of the Anti-slavery Policy). In particular the Whistleblowing Policy refers to a number of reporting tools designed to foster an environment of open, honest communication including the Adecco Compliance and Ethics Line, which is available 24 hours a day. All reports will be fully investigated and remedial action and escalation to our board of directors will follow if appropriate.

All policies are available to staff at all times via our internal intranet system.

Supplier Code of Conduct

We have a long-standing approach to supply chain responsibility and so expect our suppliers to agree and adhere to our ethical standards for doing business. These standards require (without limitation) suppliers to:

- refrain from holding a person in slavery or servitude or requiring a person to perform any form of forced or compulsory labour;
- not arrange or facilitate the trafficking of any persons;
- not purchase materials or services from companies who use involuntary labour or participate in human trafficking;
- operate in accordance with the United Nations Universal Declaration of Human Rights ("UN UDHR"), and the fundamental human rights and labour rights as articulated by the International Labour Organisation ("ILO");
- treat and reward employees equally on the basis of the characteristics of their work and the intensity of their effort;
- provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their employees;
- provide, as a minimum, rates of pay at the national legal standards; and

- act in accordance with applicable national and regional laws and regulations at all times.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff where relevant.

We have also published detailed guidance to staff on identifying and responding to an incident of modern slavery. This guidance is available at all times via our internal intranet system.

Due Diligence Processes

We have in place systems to:

- identify and assess potential risk areas in our supply chains (where appropriate);
- audit prospective suppliers (where appropriate);
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- protect whistle blowers.

Our Effectiveness in Combating Slavery and Human Trafficking

We have Business Process, Business Assurance, HR and Legal teams dedicated to ensuring compliance with law, policy and process across the business. We review our policies and procedures on a regular basis to ensure ongoing compliance. The Business Assurance team regularly audits and assesses the business to ensure and assess compliance. The results from these audits assist us in measuring how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

Further Steps

As an organisation, we are committed to building on what we do each year to prevent modern slavery and human trafficking. Following a review of the effectiveness of the actions we have implemented to date, we intend to take the following further steps to combat modern slavery and human trafficking:

1. Expand the audit requirements of prospective suppliers (where appropriate).
2. Refine the regular audits undertaken by the Business Assurance team.
3. Increase internal awareness on identifying and responding to incidents of modern slavery and human trafficking.

This statement was approved by the board of directors on 5th February 2018 and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read "J Marshall". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

John Marshall